



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

(757) 518-2000 FAX (804) 698-4178

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural and Historic Resources

David K. Paylor
Director
(804) 698-4000

Craig R. Nicol
Regional Director

August 6, 2021

Ms. Lorraine Amesbury Holder
Vice President of Operations
STIHL, Incorporated
536 Viking Drive
PO Box 2015
Virginia Beach, Virginia 23452-2015

Location: Virginia Beach
Registration Number: 60995

Dear Ms. Holder:

Attached is a permit to operate the STIHL Incorporated Virginia Beach facility pursuant to 9VAC5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. This permit incorporates provisions from the New Source Review permit dated January 19, 2018.

The permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In evaluating the application and arriving at a final decision to renew this permit, the Department deemed the application complete on January 10, 2018, and solicited EPA comments by submitting the proposed permit to EPA Region III for review on Tuesday, May 18, 2021. The seventy-five (75) day comment period (provided for in 9VAC5-80-210) expired on Thursday, August 5, 2021, with no comments having been received by this office.

This approval to operate does not relieve STIHL Incorporated Virginia Beach of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, in 9VAC5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

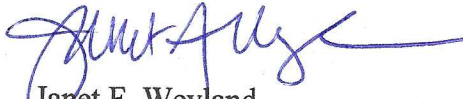
Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
PO Box 1105
Richmond, VA 23218-1105

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this draft permit, please contact James A. White, Jr. by e-mail at james.white@deq.virginia.gov.

Sincerely,



Janet F. Weyland
Regional Deputy Director

JFW/JAW/60995_012_21_T5Renewal_STIHLInc_CvrLtr.docx

Attachments: Title V Federal Operating Permit
Statement of Legal and Factual Basis (SOB)

cc: Manager/Inspector, Air Compliance
File



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**Federal Operating Permit
Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: STIHL Incorporated
Facility Name: STIHL Inc. - Virginia
Facility Location: 536 Viking Drive
Virginia Beach, Virginia 23452
Registration Number: 60995
Permit Number: TRO - 60995

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act

August 6, 2021
Effective Date

August 5, 2026
Expiration Date

August 6, 2021
Signature Date

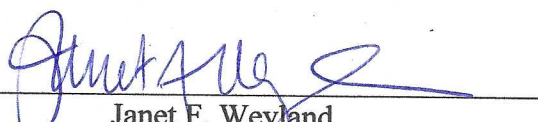

Janet F. Weyland
Regional Deputy Director

Table of Contents, 1 page.
Permit Conditions, 17 pages.

Table of Contents

FACILITY INFORMATION	3
EMISSION UNITS	5
PROCESS EQUIPMENT REQUIREMENTS	6
FACILITY WIDE CONDITIONS	10
INSIGNIFICANT EMISSION UNITS.....	13
PERMIT SHIELD & INAPPLICABLE REQUIREMENTS	14
GENERAL CONDITIONS.....	14

Facility Information

Permittee

STIHL Incorporated
PO Box 2015
Virginia Beach, Virginia 23452-2015

Responsible Official

Ms. Lorraine Amesbury Holder
Vice President of Operations

Facility

STIHL Incorporated
536 Viking Drive
Virginia Beach, Virginia 23452-2015

Contact Person

Mr. Mike Weber
Manager, Occupational Safety and Environmental Health
Office: 757-785-1365 | Cell: 757-635-1329

County-Plant Identification Number: 51-810-00044

Facility Description: NAICS 333991 - This U.S. industry comprises establishments primarily engaged in the manufacturing of power-driven (e.g., battery, corded, pneumatic) handtools, such as drills, screw-guns, circular saws, chain saws, staplers, and nailers.

NAICS 333112 - This U.S. industry comprises establishments primarily engaged in the manufacturing of powered lawnmowers, lawn and garden tractors, and other home lawn and garden equipment, such as tillers, shredders, yard vacuums, and leaf blowers.

STIHL operates an outdoor power equipment manufacturing facility in Virginia Beach. The manufacturing process begins with a series of primary operations including pre-production, machining, heat treating, and molding. Pre-production operations consist of assembling various sub-assemblies from vendor-supplied parts and from STIHL manufactured parts. Also, the STIHL logo is applied to certain parts in the Tampos printing operations. In the machining operations, vendor-supplied aluminum and steel forgings are machined into finished pistons and crankshafts, respectively. The machined crankshafts are hardened and then tempered in electrically heated furnaces in the heat-treating operations. Next, the tempered crankshafts are washed in one of two aqueous washers. As part of the heat-treating operations, chain saw sprockets are copper brazed to hubs in brazing furnaces. Molding operations include injection molding of various engineered resins to form the various plastic components used in STIHL products and a blow molding process for forming fuel tanks and backpack blower tubes. Following primary operations, the components are assembled into finished products in assembly areas. Each finished product containing an engine is then tested inside one of numerous engine test cells (using unleaded regular gasoline fuel) for carburetor adjustments to verify proper operation. After engine testing in the test cells, the outdoor power equipment products are packaged in corrugated boxes for shipment. In addition to the above operations for the manufacturing of outdoor power equipment, STIHL also operates

a process for manufacturing plastic line for use in trimmers. The plastic line is extruded and then wound onto spools in this process prior to packaging.

The facility is a Title V major source for Carbon Monoxide (CO) emissions resulting from the operation of engine test cells used in the outdoor power equipment manufacturing process. The facility is located in an attainment area for all criteria pollutants and is an area source for hazardous air pollutants (HAPs). The facility is permitted under a State Major permit which was initially issued on January 10, 2007 and amended on October 11, 2013 and June 19, 2018.

Emission Units

Equipment to be operated consists of:

Emission Unit ID (EU ID)	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	Pollutant Controlled	Applicable Permit Date
Test Cells	Multiple test cells for small engine testing; each test cell equipped with a six-gallon portable fuel tank	15.2 gal/hr; 66,429 gals/yr combined	N/A	N/A	1/4/1999
M1295	J L Becker Co. Model J1762 heated dunk washer (aqueous degreaser) for engine crankshafts	0.27 gal/hr; 1,200 gal/yr 0.33 MMBtu/hr NG-fired	N/A	N/A	6/9/2005
M1296	Surface Model BC-41617-1 heated dunk washer (aqueous degreaser) for engine crankshafts	0.27 gal/hr; 1,200 gal/yr 0.33 MMBtu/hr NG-fired	N/A	N/A	6/9/2005
MS1	Mineral spirits / aliphatic hydrocarbon solvent for general cleaning and degreasing usage	10,950 gallons/yr	N/A	N/A	6/19/2018
TP1	Tampo printing operations for application of logos	4,351 lbs VOC/yr for inks, hardeners, thinners (combined) & 900 gals/yr of ethyl alcohol	N/A	N/A	1/10/2007
BF1	NG/hydrogen-fired brazing furnace equipped with two (2) burners	0.18 MMBtu/hr	N/A	N/A	5/4/2004
TK1	Fixed-roof horizontal gasoline storage tank	12,000 gallons	N/A	N/A	5/27/2008
PTF	Gasoline loading rack for filling test cell portable fuel tanks	120 gallons/hr	N/A	N/A	5/1/2003
EG1	Diesel-fired emergency generator - installed 2002	350 kW (470 hp engine)	N/A	N/A	5-27-2013
EG2	Diesel-fired emergency generator - manufactured 2004	150 kW	N/A	N/A	5-27-2013
EG3	Propane-fired emergency generator - manufactured 2006	30 kW	N/A	N/A	N/A
EG4	Diesel-fired emergency generator - manufactured 2014	250 kW	N/A	N/A	N/A
EG6	NG-fired emergency generator - manufactured 2018	500 kW	N/A	N/A	N/A
EG7	NG-fired emergency generator - manufactured 2018	125 kW	N/A	N/A	N/A
FWP1	Diesel-fired emergency firewater pump - installed in 1970's	85 hp engine	N/A	N/A	5-27-2013

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only and is not an applicable requirement.

Production Process Requirements

1. Engine Test Cells (EU ID # Test Cells) - Fuel - The approved fuel for use in the test cells is unleaded gasoline mixed with 2-cycle lubricant oil at a ratio of gasoline to oil of 20:1 to 50:1, approximately. A change in the fuel shall be considered a change in the method of operation of the test cells and may require a new or amended permit. However, if a change in the fuel is not subject to new source review permitting requirements, this condition should not be construed to prohibit such a change. (9VAC5-80-110 and Condition 2 of 6/19/18 NSR Permit)
2. Engine Test Cells (EU ID # Test Cells) - Fuel Throughput - The test cells shall consume no more than 66,429 gallons of unleaded gasoline (not including 2-cycle lubricant oil) per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. (9VAC5-80-110 and Condition 3 of 6/19/18 NSR Permit)
3. Engine Test Cells (EU ID # Test Cells) - Emission Limits - Emissions from the operation of the test cells, combined, shall not exceed the limits specified below:

Pollutant	Lbs./hr	Tons/year
Nitrogen Oxides (as NO ₂)	0.3	0.6
Carbon Monoxide	60.4	132.2
Volatile Organic Compounds	36.0	78.8

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 2, 3, 9, and 10.

(9VAC5-80-110 and Condition 7 of 6/19/18 NSR Permit)

4. Aqueous Cleaning Solution (EU ID # M1295 and M1296) - Limits - The throughput of new Cerfa-Kleen 3550 or similar aqueous cleaning solutions containing up to 30% non-HAP VOC used in the degreasers (EU ID # M1295 and M1296) shall not exceed 2,400 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. (9VAC5-80-110 and Condition 4 of 6/19/18 NSR permit)
5. Wipe Solvent Cleaning Solutions (EU ID # MS-1) - Limits - The throughput of mineral spirit and OH 523 wipe solvent cleaner through EU ID # MS-1 shall not exceed 2,500 gallons per year (excluding the amount of mineral spirits recycled), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. (9VAC5-80-110 and Condition 5 of 6/19/18 NSR Permit)

6. Tampo Printing Operation (EU ID # TP-1) - Limits - The throughput of Volatile Organic Compounds in the inks, hardeners, and thinners, combined, for the Tampo printing operation shall not exceed 4,351 pounds per year, calculated monthly as the sum of each consecutive 12-month period. The throughput of ethyl alcohol for the Tampo printing operation shall not exceed 900 gallons per year (6,040 pounds per year), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9VAC5-80-110 and Condition 6 of 6/19/18 NSR permit)
7. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG4, EG6, EG7, and FWP1) - Fuel - The approved fuels for the stationary reciprocating internal combustion engines (RICEs) used at the facility are as follows:

Compression-ignition (CI) RICE for generators EG1, EG2, EG4, and Firewater Pump FWP1:
Diesel fuel which meets ASTM specification D975 having a maximum sulfur content of 0.0015%

Spark-ignition (SI) RICE for generator EG3: Propane which meets ASTM specification D1835

Spark-ignition (SI) RICE for generator EG6 & EG7: Natural Gas having a minimum heat content of 950 Btu/scf HHV as determined by ASTM D1826, D2382, or an approved equivalent method

A change in the fuel type used by a RICE shall be considered a change in the method of operation of the RICE and may require a new or amended permit. However, if a change in the fuel is not subject to new source review permitting requirements, this condition should not be construed to prohibit such a change.
(9VAC5-80-110)
8. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG4, EG6, EG7 and FWP1) - MACT Subpart ZZZZ - The permittee shall comply with all applicable provisions of 40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) regarding the operation of each stationary RICE.
(9VAC5-80-100, 9VAC5-80-110, and 40 CFR 63, Subpart ZZZZ)
9. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG3 and FWP1) - MACT Subpart ZZZZ - The RICEs for the stationary emergency generators EG1 - EG3 and firewater pump FWP1 shall comply with the applicable requirements in Table 2d and Table 6 of 40 CFR 63, Subpart ZZZZ, except for startup periods. During periods of startup, the engine's time spent at idle must be minimized and the startup time for the RICE be minimized to a period needed for appropriate and safe engine loading, not to exceed 30 minutes, after which time the non-startup emission limitations shall apply.
(9VAC5-60-100, 9VAC5-80-110, and 40 CFR 63.6603(a))
10. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG3 and FWP1) - MACT Subpart ZZZZ - For the emergency RICEs used to power the stationary emergency generators EG1 - EG3 and the firewater pump FWP1, any operations other than emergency operations, periodic maintenance, testing, operator training, and operation in non-emergency situations for up to 50 hours per year, as described in this condition, is prohibited:

- a. There shall be no time limit on the use of the stationary emergency RICEs in emergency situations;
 - b. The emergency RICEs may be operated for any combination of the purposes specified in paragraphs 40 CFR 63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs §63.6640(f)(3 - 4) counts as part of the 100 hours per calendar year allowed by this paragraph;
 - c. The emergency RICEs may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year allowed for periodic maintenance, testing, and operator training provided in Condition 10 b of this permit. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; and
 - d. If a stationary emergency RICE is not operated in accordance with the above requirements, the subject RICE shall not be considered an emergency engine and will be required to comply with all applicable 40 CFR 63, Subpart ZZZZ requirements for a non-emergency RICE per the definition of an emergency stationary RICE in §63.6675, which includes operating in accordance to the provisions specified in §63.6640(f).
(9VAC5-80-110 and 40 CFR 63.6640(f))
11. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG3 and FWP1) - MACT Subpart ZZZZ - For the RICEs of the stationary emergency generators EG1 - EG3 and the firewater pump FWP1, the permittee shall:
- a. Operate and maintain the RICE and after-treatment control device (if any) according to the engine manufacturer's emission-related written instructions or develop a maintenance plan that provides for the maintenance and operation of the RICE in a manner consistent with good air pollution control practice for minimizing emissions;
 - b. Install a non-resettable hour meter if one is not already installed on the RICE; and
 - c. As an option, an oil analysis program may be utilized by the permittee in order to extend the specified oil change requirement. The oil analysis program shall be performed according to the requirements specified in 40 CFR 63.6625(i).
(9VAC5-60-100, 9VAC5-80-110, and 40 CFR 63.6625(e, f, and i))
12. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG3 and FWP1) - MACT Subpart ZZZZ - For the RICEs of the stationary emergency generators EG1 - EG3 and emergency firewater pump FWP1, the following written recordkeeping shall be maintained:
- a. For each RICE, records of the operating hours recorded by a non-resettable hour meter and documentation as to the number of hours spent for emergency operations (including documentation as to what classified the operation as emergency) and the number of hours spent for non-emergency operations; and
 - b. Records of the hours for maintenance conducted on the RICE and after-treatment control device (if any) in order to demonstrate that the engine was operated and maintained according to the permittee's own maintenance plan.

These records shall be maintained at the facility for inspection and be current for the most recent five (5) year period.

(9VAC5-60-100, 9VAC5-80-110, and 40 CFR 63.6655(a, d, e, and f))

13. Stationary Emergency Generator Engines (EU ID # EG4, EG6, and EG7) - NSPS Subparts IIII & JJJJ - The permittee shall comply with the requirements of MACT, Subpart ZZZZ for the emergency RICE used to power the stationary emergency generator EG4 by meeting the appropriate provisions of 40 CFR part 60, Subpart IIII. For the RICE used to power the stationary emergency generator EG6 and EG7, the requirements of MACT, Subpart ZZZZ shall be met by complying with the appropriate provisions of 40 CFR part 60, Subpart JJJJ. No further requirements apply for these RICEs under MACT, Subpart ZZZZ.
(9VAC5-60-100, 9VAC5-80-110, 40 CFR 63.6590(c))
14. Stationary Emergency Generator Engines and Firewater Pump Engine (EU ID # EG1 - EG4, EG6, EG7, and FWP1) - Recordkeeping - The permittee shall keep records on the stationary emergency RICEs in accordance with the appropriate provisions stipulated in 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ, and 40 CFR 63, Subpart ZZZZ. These records shall be maintained at the facility for inspection and be current for the most recent five (5) year period.
(9VAC5-60-100, 9VAC5-80-110, 40 CFR 63.6660, and 40 CFR 63.10(b)(1))
15. Gasoline Fuel Storage Tank (EU ID # TK1) - MACT Subpart CCCCCC - The 12,000 gallon capacity fixed-roof, horizontal gasoline storage tank, located at the facility shall comply with the provisions of 40 CFR 63, Subpart CCCCCC (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities). The monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from the TK1 storage tank during the current day, plus the total volume of gasoline loaded into, or dispensed from the tank during the previous 364 days, and then dividing that sum by 12. The permittee shall demonstrate compliance with the applicable provisions MACT, Subpart CCCCCC by meeting the following:
 - a. Covering all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use (40 CFR 63.11116 (a)(3)); and
 - b. Using portable gasoline containers (i.e.: test cell six-gallon portable fuel tanks) that meet the requirements stipulated in 40 CFR 59, Subpart F (40 CFR 63.11116 (d)).

If the monthly gasoline throughput ever exceeds an applicable throughput threshold, the source shall remain subject to the requirements for a source above the threshold, even if the affected source's throughput later falls below the applicable monthly gasoline throughput threshold. Records documenting the combined monthly throughput of gasoline for storage tank TK1 shall be maintained on site for a period of five (5) years and shall be made available within 24 hours upon request.
(9VAC5-80-110 and 40 CFR 63, Subpart CCCCCC)

Facility Wide Conditions

16. VOC Work Practice Standards - Requirements - At all times the disposal of volatile organic compounds (VOC) shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9VAC5-80-110 and Condition 1 of 6/19/18 NSR permit)
17. Facility Wide Conditions - Maintenance / Operation of Source - At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
(9VAC5-80-110 and Condition 14 of 6/19/18 NSR permit)
18. Facility Wide Conditions - Limitations - Total emissions from the facility shall not exceed the limits specified below, calculated monthly as the sum of each consecutive twelve (12) month period:

Process / Operation	Tons/year
<u>Wipe Cleaners and Degreasers</u>	
Volatile Organic Compounds	7.9
<u>Tampo Printing Operation</u>	
Volatile Organic Compounds	5.2
<u>Total facility-wide (including test cells)</u>	
Nitrogen Oxides (as NO ₂)	4.7
Carbon Monoxide	135.0
Volatile Organic Compounds	93.3

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 2 - 6, 9, and 10.

(9VAC5-80-110 and Condition 8 of 6/19/18 NSR Permit)

19. Facility Wide Conditions - Visible Emissions Limits - Visible emissions from the facility exhausts shall not exceed five percent (5%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed twenty percent (20%) opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times, including periods of startup, shutdown, and malfunction.
(9VAC5-80-110 and Condition 9 of 6/19/18 NSR permit)
20. Facility Wide Conditions - Visible Emissions Monitoring - The permittee shall, at a minimum, perform a visual observation each calendar month (visually observing the entire rooftop at one time rather than each individual exhaust outlet one at a time) of the rooftop where the test cell exhaust outlets are located. All rooftop test cell exhaust outlets shall be included in the scan. The observation shall last for at least a one-minute period during daylight hours when the engine test cells are

operating at normal load/capacity to determine if there are any visible emissions. If visible emissions are noted, the permittee shall take appropriate action immediately to correct the cause of the visible emissions. If visible emissions continue after the corrective actions have been performed, a visible emissions evaluation (VEE) shall be immediately conducted for at least six (6) minutes (24 consecutive observations at 15-second intervals) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for each stack exhibiting visible emissions. If the VEE opacity average exceeds five percent (5%) opacity, the VEE shall continue for one (1) hour from initiation. If results show that the facility is out of compliance with the opacity limits, the malfunction notification requirement in Condition 16 of the NSR permit issued June 19, 2018 shall apply. A record logbook shall be kept for all visual evaluations, VEEs, identification of stacks to which VEEs are performed, and any required corrective actions concerning the rooftop vents. The logbook shall be kept at the facility and made available for inspection by the DEQ for the most recent five (5) year period. (9VAC5-80-110)

21. Facility Wide Conditions - Recordkeeping - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:
- a. Annual consumption (in gallons) of unleaded gasoline (not including 2-cycle lubricant oil) by the test cells, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
 - b. Records demonstrating compliance with the gasoline to 2-cycle lubricant oil ratio for the fuel used in the engine test cells as specified in Condition 1 of this permit;
 - c. Annual throughput (in gallons) of new cleaning solution Cerfa-Kleen 3550 used in the degreasers (EU ID # M1295 and M1296), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
 - d. Annual combined throughput (in gallons) of mineral spirits (minus recycled mineral spirits) and OH 523 solvent (or equivalent) wipe solvent cleaner, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
 - e. Monthly VOC emissions calculations for the combined use of inks, hardeners, and thinners in the Tampo printing operation to verify compliance with the VOC pounds/yr emissions limitation in Condition 18 of this permit. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
 - f. Records of the monthly throughput (in gallons) of gasoline for the storage tank TK-1;
 - g. Annual throughput (in gallons) of ethyl alcohol for the Tampo printing operation, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

- h. Records documenting the hours of operation for each stationary emergency RICE per Condition 10 of this permit. Records shall be kept in accordance with the requirements listed in 40 CFR 63.6660;
- i. Material Safety Data Sheets (MSDS), Certified Product Data Sheets (CPDS), or other vendor information as approved by DEQ showing VOC content and HAP content for each cleaning solution used in the degreasers (EU ID # M1295 and M1296);
- j. MSDS, CPDS, or other vendor information as approved by DEQ showing VOC content and HAP content for the inks, hardeners, and thinners used in the Tampo printing process;
- k. Records of visual evaluations, visible emissions evaluations, and corrective actions taken, to demonstrate compliance with the opacity limits in this permit; and
- l. Scheduled and unscheduled maintenance and operator training.

These records shall be maintained at the facility for inspection and be current for the most recent five (5) year period.

(9VAC5-50-50, 9VAC5-80-110, and Condition 10 of 6/19/18 NSR Permit)

- 22. Facility Wide Conditions - Violation of Ambient Air Quality Standards - The permittee shall, upon request of the DEQ, reduce the level of operation or shutdown a facility, as necessary, to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9VAC5-80-110 and Condition 21 of 6/19/18 NSR permit)
- 23. Facility Wide Conditions - Testing - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9VAC5-50-30, 9VAC5-80-110, and Condition 11 of 6/19/18 NSR Permit)
- 24. Facility Wide Conditions - Testing - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
(9VAC5-80-110)

Insignificant Emission Units

25. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720 B)	Rated Capacity (9VAC5-80-720 C)
Brazing furnace (NG and hydrogen)	9VAC5-80-720 C	NO _x , CO, VOC	0.18 MMBtu/hr
Brazing furnaces (electric)	9VAC5-80-720 B	NO _x , CO	N/A
NG/propane-fired heat treating furnace	9VAC5-80-720 C	NO _x , CO, VOC	118 scf/hr
NG/propane-fired heat treating furnace	9VAC5-80-720 C	NO _x , CO, VOC	600 scf/hr
NG/propane-fired heat treating furnace	9VAC5-80-720 C	NO _x , CO, VOC	600 scf/hr
NG-fired pyrolysis furnace	9VAC5-80-720 C.2.a	VOC	0.325 MMBtu/hr
NG-fired boiler	9VAC5-80-720 C	NO _x , CO, VOC	1.0 MMBtu/hr
NG-fired heat treating hot-water heater	9VAC5-80-720 C	NO _x , CO, VOC	0.33 MMBtu/hr
NG-fired heat treating hot-water heater	9VAC5-80-720 C	NO _x , CO, VOC	0.33 MMBtu/hr
Gasoline loading rack	9VAC5-80-720 B	VOC	120 gallons/hr
Ink-jet printer	9VAC5-80-720 B	VOC	140 gallons/yr
Durr closed-loop degreaser	9VAC5-80-720 B	VOC	< 5 tons/yr
Solvent recycler for recovering mineral spirits for reuse	9VAC5-80-720 B	VOC	< 5 tons/yr
Magnaflux machine for magnetic particle inspection	9VAC5-80-720 B	VOC	< 5 tons/yr
Resin extrusion machines	9VAC5-80-720 B	PM, NO _x , CO, VOC	< 5 tons/yr
Resin storage silos	9VAC5-80-720 B	PM	< 5 tons/yr
Resin conveyance vacuum pumps	9VAC5-80-720 B	PM	< 5 tons/yr

9VAC5-80-720 B - Insignificant due to emission levels

9VAC5-80-720 C - Insignificant due to size or production rate

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110.
(9VAC5-80-110)

Permit Shield & Inapplicable Requirements

26. Permit Shield & Inapplicable Requirements - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 63, Subpart P	National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands	The engine test cells operated at the facility are not applicable to this MACT as they are located at an area source for HAPs.
40 CFR 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	All boilers operated at the facility combust only gaseous fuel (NG) and therefore are exempt from the MACT.
40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units	All boilers have maximum rated heat input capacities less than 10 MMBtu/hr each and therefore are not subject to the NSPS.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9VAC5-80-110 and 9VAC5-80-140)

General Conditions

27. General Conditions - Federal Enforceability - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9VAC5-80-110)
28. General Conditions - Permit Expiration -
- This permit has a fixed term of five (5) years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
 - The owner shall submit an application for renewal at least six months but no earlier than eighteen (18) months prior to the date of permit expiration.
 - If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the Board takes final action on the application under 9VAC5-80-150.

- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
 - e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
 - f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant to section 9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9VAC5-80-80, 9VAC5-80-110, and 9VAC5-80-170)
29. General Conditions - Recordkeeping and Reporting - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
- a. The date, place as defined in the permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
(9VAC5-80-110)
30. General Conditions - Recordkeeping and Reporting - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9VAC5-80-110)
31. General Conditions - Recordkeeping and Reporting - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1st and September 1st of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:
- a. The time period included in the report. The time periods to be addressed are January 1st to June 30th and July 1st to December 31st; and
 - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedances of emissions limitations or operational restrictions;

- ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or
- iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9VAC5-80-110)

32. General Conditions - Annual Compliance Certification - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1st of each calendar year, a certification of compliance with all terms and conditions of this permit, including emission limitation standards or work practices for the period ending December 31st. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1st to December 31st;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One (1) copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3_APD_Permits@epa.gov

(9VAC5-80-110)

33. General Conditions - Permit Deviation Reporting - The permittee shall notify the Tidewater Regional Office within four (4) daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one (1) hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9VAC5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9VAC5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 31 of this permit.
(9VAC5-80-110 F.2)
34. General Conditions - Failure/Malfunction Reporting - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one (1) hour, the owner shall no later than four (4) daytime business hours after the malfunction is discovered, notify the Tidewater Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9VAC5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9VAC5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Tidewater Regional Office.
(9VAC5-80-110 and 9VAC5-20-180)
35. General Conditions - Severability - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9VAC5-80-110)
36. General Conditions - Duty to Comply - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9VAC5-80-110)
37. General Conditions - Need to Halt or Reduce Activity not a Defense - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9VAC5-80-110)
38. General Conditions - Permit Modification - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9VAC5-80-110, 9VAC5-80-190, and 9VAC5-80-260)

39. General Conditions - Property Rights - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9VAC5-80-110)
40. General Conditions - Duty to Submit Information - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9VAC5-80-110)
41. General Conditions - Duty to Submit Information - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.
(9VAC5-80-110)
42. General Conditions - Duty to Pay Permit Fees - The owner of any source for which a permit under 9VAC5-80-50 through 9VAC5-80-300 was issued shall pay permit fees consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 in addition to an annual permit maintenance fee consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15th of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9VAC5-80-2340, adjusted annually by the change in the Consumer Price Index.
(9VAC5-80-110, 9VAC5-80-340, and 9VAC5-80-2340)
43. General Conditions - Fugitive Dust Emission Standards - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
 - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and

- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
(9VAC5-50-90 and 9VAC5-80-110)
- 44. General Conditions - Startup, Shutdown, and Malfunction - At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9VAC5-50-20 E and 9VAC5-80-110)
- 45. General Conditions - Alternative Operating Scenarios - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.
(9VAC5-80-110)
- 46. General Conditions - Inspection and Entry Requirements - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
 - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
(9VAC5-80-110)

47. General Conditions - Reopening for Cause - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three (3) years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:
- The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D. (9VAC5-80-110)
48. General Conditions - Permit Availability - Within five (5) days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request. (9VAC5-80-110 and 9VAC5-80-150)
49. General Conditions - Transfer of Permits
- No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
 - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
 - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200. (9VAC5-80-110 and 9VAC5-80-160)
50. General Conditions - Permit Revocation or Termination for Cause - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations. (9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)

51. General Conditions - Duty to Supplement or Correct Application - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9VAC5-80-110 and 9VAC5-80-80 E)
52. General Conditions - Stratospheric Ozone Protection - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9VAC5-80-110 and 40 CFR Part 82)
53. General Conditions - Asbestos Requirements - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9VAC5-60-70 and 9VAC5-80-110)
54. General Conditions - Accidental Release Prevention - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(9VAC5-80-110 and 40 CFR Part 68)
55. General Conditions - Changes to Permits for Emissions Trading - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9VAC5-80-110)
56. General Conditions - Emissions Trading - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
 - a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
 - c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.
(9VAC5-80-110)